

**HOUSE OF REPRESENTATIVES
FINAL BILL ANALYSIS**

BILL #:	CS/CS/HB 1435	FINAL HOUSE FLOOR ACTION:		
SUBJECT/SHORT TITLE	Child Welfare	115	Y's 0	N's
SPONSOR(S):	Health Care Appropriations Subcommittee; Children, Families & Seniors Subcommittee; Perez and others	GOVERNOR'S ACTION:	Approved	
COMPANION BILLS:	CS/CS/SB 590			

SUMMARY ANALYSIS

CS/CS/HB 1435 passed the House on March 6, 2018, and subsequently passed the Senate on March 8, 2018.

The bill authorizes DCF to create a "family finding" program, subject to the availability of resources. The program will support DCF and the community-based care organizations (CBCs) in identifying and locating relatives and fictive kin during a child's dependency case using a range of search methods, such as interviews with extended family, specialized computer searches, and genograms. Family finding efforts may begin as soon as a child comes under DCF supervision and may be used throughout the dependency process to engage prospective kinship caregivers.

The bill also allows CBCs to establish kinship navigator programs, subject to the availability of resources, to help relative caregivers and fictive kin locate and access support services available to them and the children in their care through a website, a toll-free phone hotline, and other similar resources.

The bill creates a new exemption from the Rilya Wilson Act requirements related to attendance in child care or early education programs. Children aged 0-3 will be allowed to remain at home with a stay-at-home caregiver or attend an early education or child care program fewer than 5 days per week if they reside with a caregiver who works less than full time.

Lastly, the bill establishes new requirements that would facilitate the continuity of a child's participation in early education or child care programs upon removal from the family home.

The bill is not expected to have a fiscal impact upon the department or CBCs because implementation of the family-finding program and the kinship navigator program are permissive.

The bill was approved by the Governor on March 23, 2018, ch. 2018-108, L.O.F., and will become effective on July 1, 2018.

I. SUBSTANTIVE INFORMATION

A. EFFECT OF CHANGES:

Background

Child Welfare System

The child welfare system identifies families whose children are in danger of suffering or have suffered abuse, abandonment, or neglect and works with those families to address the problems that are endangering children, if possible. If the problems cannot be addressed, the child welfare system finds safe out-of-home placements for these children.

To serve families and children, the Department of Children and Families (DCF) contracts for foster care and related services with lead agencies, also known as community-based care organizations (CBCs). The outsourced provision of child welfare services was intended to increase local community ownership of service delivery and design.¹ DCF, through the CBCs, administers a system of care for children² to:

- Prevent children's separation from their families;
- Intervene to allow children to remain safely in their own homes;
- Reunify families who have had children removed from their care, if possible and appropriate;
- Ensure safety and normalcy for children who are separated from their families;
- Enhance the well-being of children through educational stability and timely health care;
- Provide permanency; and
- Develop their independence and self-sufficiency.

Florida uses funds from a variety of federal sources for child welfare services, such as the Social Services Block Grant, the Temporary Assistance to Needy Families block grant, Title XIX Medicaid administration, Title IV-B, Title IV-E, and various other child welfare grants; and state general revenue.

Child Protective Investigations

A child protective investigation begins with a report by any person to the Florida abuse hotline.³ The state is required to maintain a 24 hour per day, 7 day per week capacity for receiving reports of maltreatments.⁴ When allegations of abuse, abandonment, or neglect of a child are reported to DCF's child abuse hotline and the hotline employee believes that the report meets the statutory definition of the allegations, an investigation by a child protective investigator is triggered.⁵ A child protective investigation must be commenced either immediately or within 24 hours after the report is received, depending on the nature of the allegation.⁶ Pursuant to s. 39.301, F.S., a child protective investigation includes a thorough review of case details, which typically includes duties such as:

- An assessment of all information relevant to the allegations;
- In-person interviews with the child, his or her siblings, and the parents or legal guardians;
- An evaluation of the child's residence; and,
- A complete assessment of the child's immediate safety.⁷

¹ Department of Children and Families, *Community-Based Care*, <http://www.myflfamilies.com/service-programs/community-based-care> (last accessed November 16, 2017).

² S. 409.145(1), F.S.

³ S. 39.201(4), F.S.

⁴ S. 39.201(5), F.S.

⁵ S. 39.201(2)(a), F.S.

⁶ *Supra* note 4.

⁷ S. 39.301, F.S.

Dependency Case Process

When DCF removes a child from his or her home, a series of dependency court proceedings must occur to adjudicate the child dependent and place him or her in out-of-home care.

Many of the federal requirements related to the dependency process can be traced to the Adoption and Safe Families Act (ASFA) of 1997.⁸ The AFSA expanded the use of detailed case planning, while emphasizing the well-being of children at all critical points during the dependency case process.⁹ It further requires that states make timely decisions regarding permanency. The permanency goal is enforced primarily via a requirement that states terminate the parental rights of children who have spent 15 or more months of the past 22 months in foster care.¹⁰

Throughout the dependency process, DCF must develop and refine a case plan with input from all parties to the dependency case that details the problems being addressed as well as the goals, tasks, services, and responsibilities required to address the concerns of the state.¹¹ The case plan follows the child from the provision of voluntary services through dependency, or termination of parental rights.¹² Once a child is found dependent, a judge reviews the case plan, and if the judge accepts the case plan as drafted, orders the case plan to be followed.¹³

The Dependency Process

Dependency Proceeding	Description of Process	Controlling Statute
Removal	A child protective investigation determines the child's home is unsafe, and the child is removed.	s. 39.401, F.S.
Shelter Hearing	A shelter hearing occurs within 24 hours after removal. The judge determines whether to keep the child out-of-home.	s. 39.401, F.S.
Petition for Dependency	A petition for dependency occurs within 21 days of the shelter hearing. This petition seeks to find the child dependent.	s. 39.501, F.S.
Arraignment Hearing and Shelter Review	An arraignment and shelter review occurs within 28 days of the shelter hearing. This allows the parent to admit, deny, or consent to the allegations within the petition for dependency and allows the court to review any shelter placement.	s. 39.506, F.S.
Adjudicatory Trial	An adjudicatory trial is held within 30 days of arraignment. The judge determines whether a child is dependent during this trial.	s. 39.507, F.S.
Disposition Hearing	If the child is found dependent, disposition occurs within 15 days of arraignment or 30 days of adjudication. The judge reviews the case plan and placement of the child. The judge orders the case plan for the family and the appropriate placement of the child.	s. 39.506, F.S. s. 39.521, F.S.
Judicial Review Hearings	The court must review the case plan and placement every 6 months, or upon motion of a party.	s. 39.701, F.S.
Petition for Termination of Parental Rights	Once the child has been out of home for 12 months, if DCF determines that reunification is no longer a viable goal, termination of parental rights is in the best interest of the child, and other requirements are met, a petition for termination of parental rights is filed.	s. 39.802, F.S. s. 39.8055, F.S. s. 39.806, F.S. s. 39.810, F.S.

⁸ Public Law 105-89, codified in 42 U.S.C. ss. 671-679.

⁹ Committee on Child Maltreatment Research, Policy, and Practice for the Next Decade: Phase II, New Directions in Child Abuse and Neglect Research (2004), available at <https://www.ncbi.nlm.nih.gov/books/NBK195980/> (last accessed November 6, 2017).

¹⁰ Department of Children and Families, *Child Welfare Key Indicators Monthly Report*, November 2017, p. 29, available at http://centerforchildwelfare.fmhi.usf.edu/qa/cwkeyindicator/KI_Monthly_Report_Nov2017.pdf (last accessed January 9, 2018).

¹¹ Ss. 39.6011 and 39.6012, F.S.

¹² S. 39.01(11), F.S.

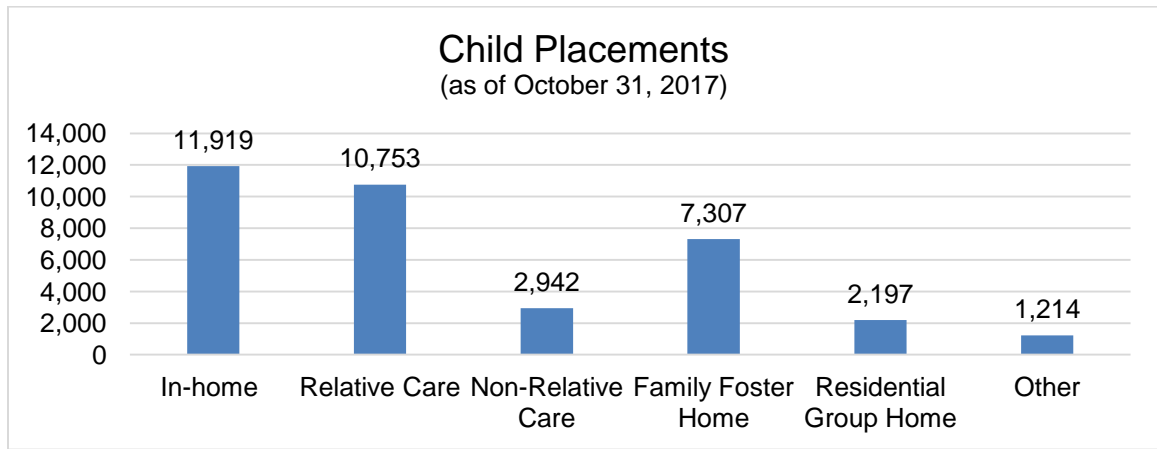
¹³ S. 39.521, F.S.

Advisory Hearing	This hearing is set as soon as possible after all parties have been served with the petition for termination of parental rights. The hearing allows the parent to admit, deny, or consent to the allegations within the petition for termination of parental rights.	s. 39.808, F.S.
------------------	--	-----------------

Adjudicatory Trial	An adjudicatory trial shall be set within 45 days after the advisory hearing. The judge determines whether to terminate parental rights to the child at this trial.	s. 39.809, F.S.
--------------------	---	-----------------

Placements of Children in the Child Welfare System

DCF places children under departmental supervision in a variety of settings, and a recent accounting of those placements is reflected below.



Source: Department of Children and Families, Child Welfare Key Indicators Monthly Report, November 2017, p. 29-30.

In-Home and Out-of-Home Care

DCF is required to administer a system of care that endeavors to keep children with their families and provides interventions to allow children to remain safely in their own homes.¹⁴ Protective investigators and CBC case managers can refer families for in-home services to allow children who would otherwise be unsafe to remain in their own homes. As of October 31, 2017, 11,909 children were receiving services in their homes.¹⁵

When a child protective investigator determines that in-home services are not enough to allow a child to safely remain in his or her home, the investigator removes the child from his or her home and places the child with a safe and appropriate temporary placement. These temporary placements, referred to as out-of-home care, provide housing and services to children until they can return home to their families or achieve permanency with other families through adoption or guardianship.¹⁶ Out-of-home placements range from temporary placement with a family member to a family foster home to a residential child-caring agency to a permanent adoptive placement with a family previously unknown to the child.¹⁷ As of October 31, 2017, 24,576 children were in out-of-home care.¹⁸

CBCs must place all children in out-of-home care in the most appropriate available setting after conducting an assessment using child-specific factors.¹⁹ Legislative intent is to place children in a

¹⁴ *Supra* note 2.

¹⁵ *Supra* note 10.

¹⁶ Office of Program Policy and Government Accountability, Research Memorandum, Florida’s Residential Group Care Program for Children in the Child Welfare System (December 22, 2014) (on file with the Children, Families, and Seniors Subcommittee).

¹⁷ S. 409.175, F.S.

¹⁸ *Supra* note 10.

¹⁹ Child-specific factors include age, sex, sibling status, physical, educational, emotional, and developmental needs, maltreatment, community ties, and school placement. (Rule 65C-28.004, F.A.C.)

family-like environment when they are removed from their homes.²⁰ When possible, child protective investigators and lead agency case managers place children with relatives or responsible adults whom they know and with whom they have a relationship. These out-of-home placements are referred to as relative and non-relative caregivers. When a relative or non-relative caregiver placement is not possible, case managers try to place children in family foster homes licensed by DCF.

Relatives and Non-Relative Caregivers

Research indicates that children in the care of relatives and non-relatives known to them, such as grandparents or family friends, benefit from increased placement stability compared to children placed in general foster care. As opposed to children living in foster care, children living in relative and non-relative kinship care are more likely to remain in their own neighborhoods, and have more consistent interactions with their birth parents than do children who are placed in foster care, which might contribute to less disruptive transitions into out-of-home care.²¹

Evidence demonstrates that children in relative and kinship care:

- Experience less trauma than when they are placed with strangers;
- Are more likely to be placed together with their siblings;
- Experience fewer behavioral problems than children in traditional foster care;
- Are able to stay connected to their extended family networks and maintain cultural and familial ties; and,
- Are less likely to be on psychotropic medication.²²

Moreover, recent research indicates that children placed with relative guardians are more likely to achieve permanency goals with those guardians than children placed in other forms of foster care.²³

Florida law already maintains strong preferences for relative placements throughout its child welfare system. Section 39.5085, F.S., includes guidelines for relative care and indicates that DCF should attempt to:

- Recognize family relationships in which a grandparent or other relative is the head of household that includes a child otherwise at risk of foster care placement; and,
- Enhance family preservation and stability by recognizing that most children in such placements with grandparents and other relatives do not need intensive supervision of the placement by the courts or by the department.²⁴

The Legislature established the Relative Caregiver Program (RCP) in 1998, which provides temporary cash assistance to individuals who meet eligibility rules and have custody of a relative child under age 18 who has been placed in his or her home through the dependency system.²⁵ In 2014, the program expanded to include nonrelatives with whom a child may have a close relationship, though its name remained the same.²⁶ Those nonrelatives are eligible for financial assistance if they are able and willing to care for the child and provide a safe, stable home environment. The court must find that a proposed placement is in the best interest of the child.²⁷

²⁰ S. 39.001(1), F.S.

²¹ David Rubin and Downes, K., et al., *The Impact of Kinship Care on Behavioral Well-being for Children in Out-of-Home Care* (June 2, 2008), available at: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2654276/> (last accessed January 10, 2018).

²² MaryLee Allen and Jennifer Miller. "Kinship Care and the Fostering Connections Act." *Perspectives on Fostering Connections: A Series of White Papers on the Fostering Connections to Success and Increasing Adoptions Act of 2008*. February 2013. Available at <http://www.childrensdefense.org/library/data/state-data-repository/perspectives-on-fostering.pdf> (last accessed January 9, 2018).

²³ Tessa Bell and Elisa Romano. "Permanency and Safety Among Children in Foster Family and Kinship Care: A Scoping Review." *Trauma, Violence, & Abuse* Vol 18, Issue 3, pp. 268 – 286. October 11, 2015.

²⁴ S. 39.001(1)(b)4.f. and S. 39.001(1)(b)4.j., F.S.

²⁵ S. 39.5085(2), F.S.

²⁶ Ch. 2014-224, Laws of Florida.

²⁷ *Supra* note 13.

The intent of the RCP is to provide support to relative caregivers who would otherwise struggle with the financial impact of taking a child into their homes. Relative caregivers may face a wide range of barriers to providing care to a child. Grandparents or other relatives may be retired and living on fixed incomes.

Moreover, prospective caregivers must seek legal assistance in order to take steps necessary to establish guardianship.²⁸ The relative caregiver program is funded with a combination of federal revenues under the Temporary Assistance to Needy Families (TANF) program and state revenues (particularly for the non-relative component, which does not qualify for TANF funding).²⁹ At present, the basic monthly payment amount to relatives and non-relative caregivers under the program is linked to the age of the child under care:

- Age 0 through age 5 - \$242 per month;
- Age 6 through age 12 - \$249 per month; and,
- Age 13 through age 18 - \$298 per month.³⁰

The program also exempts students in the custody of a relative or non-relative caregiver on their 18th birthdays from paying certain fees and college tuition. Such students are exempt from paying fees and tuition at school districts that provide workforce education, institutions in the Florida College System, and state universities.³¹

Kinship Navigator Programs

Kinship navigator programs assist relative caregivers by providing access to a broad range of services and supports that help meet the needs of the children they are raising. They help caregivers navigate the services available to them by offering general information, referrals to specialists, and eligibility requirements for certain benefits.³² Kinship navigators are intended to serve as a "one stop shop" for relatives seeking accurate and up-to-date information about the benefits, services, supports, and programs available for kinship caregivers.³³

Several states have established kinship navigators in the recent past, with early indications that these programs may ease the transition into guardianship and improve outcomes for both guardian and child.³⁴

Child Care Services

The Office of Child Care (OCC) of the United States Department of Health and Human Services supports low-income working families by providing access to affordable, high-quality child care. OCC works with state, territory and tribal governments to provide support for children and their families to

²⁸ Generations United. *Grandparents and Other Relatives Raising Children: The Second Intergenerational Action Agenda*. January 2005. Available at http://www.gu.org/LinkClick.aspx?fileticket=c2yD_u_JY_4%3D&tabid=157&mid=606 (last accessed January 28, 2018).

²⁹ Some children placed with a relative guardian are eligible for the TANF "child only" program. For more information, see Department of Children and Families, *Temporary Assistance to Needy Families State Plan Renewal: October 1, 2014 – September 31, 2017*. Available at <http://www.dcf.state.fl.us/programs/access/docs/TANF-Plan.pdf> (last accessed January 17, 2018).

³⁰ 65C-28.008, F.A.C.

³¹ S. 1009.25(1)(d), F.S.

³² Children's Defense Fund. "Help Children Being Raised By Grandparents and Other Relatives and Their Relative Caregivers by Expanding and Establishing Kinship Navigator Programs." June 2009. Available at <http://www.grandfamilies.org/Portals/0/documents/Resources/Fostering%20Connections%20Resources/kinship-navigator-programs.pdf> (last accessed January 24, 2018).

³³ American Bar Association. "Kinship Care Navigator Programs: An Overview of Existing Programs and a Look to the Future." Available at https://www.americanbar.org/content/dam/aba/migrated/child/PublicDocuments/navigator_program.authcheckdam.pdf (last accessed January 24, 2018).

³⁴ James Bell Associates. "Family Connection Discretionary Grants 2009-Funded Grantees Cross-Site Evaluation Report – Final." June 17, 2013. Available at http://www.nrcpfc.org/grantees_public/2009/Fam%20Conn%20Summary%20and%20Recommendations%206-17-13%20Stand-Alone%20Final.pdf (last accessed January 24, 2018).

promote family economic self-sufficiency and to help children succeed in school and life through affordable, high-quality early care and afterschool programs.³⁵

Florida's Office of Early Learning (OEL)³⁶ provides state-level administration for the School Readiness program. The School Readiness program is a state-federal partnership between OEL and the Office of Child Care of the United States Department of Health and Human Services.³⁷ The School Readiness program receives funding from a mix of state and federal sources, including the federal Child Care and Development Block Grant (CCDBG), the federal Temporary Assistance for Needy Families (TANF) block grant, general revenue, and other state funds.³⁸ The school readiness program gives subsidies for child care services and early childhood education to low-income families and for children in protective services who are at risk of abuse, neglect, or abandonment; and children with disabilities.

The program uses a variety of providers, such as licensed and unlicensed child care providers and public and nonpublic schools.³⁹ DCF's Office of Child Care Regulation, as the entity responsible for the state's child care provider licensing program, regulates many, but not all, child care providers that provide early learning programs.⁴⁰

The Rilya Wilson Act

Foster child Rilya Wilson disappeared from state custody in January 2001. The child's caregiver maintained that DCF personnel removed Rilya from her home in January 2001, yet DCF was unaware that Rilya was missing until April 2002 due to casework failures. While Rilya's caregiver was sentenced to 55 years in prison in 2013 for her disappearance, Rilya remains missing.⁴¹ Rilya's case received national attention and led to the adoption of legislation that created greater oversight of children in child care and early education programs who are under DCF supervision.

The Rilya Wilson Act requires that children age three years to school entry who are under court ordered protective supervision or in the custody of the Family Safety Program Office of the DCF or a community-based lead agency, and enrolled in a licensed early education or child care program, participate in the program five days a week.⁴² When a child is enrolled in an early education or child care program regulated by DCF, the child's attendance must be a required action in the child's case plan. Only the court may grant an exemption to the requirement that an enrolled child participate in the relevant program five days per week.⁴³

The Act also established an enforcement model to ensure that enrolled children under DCF supervision are meeting attendance requirements. The person with whom the child is living is required to report any absence to the program on the day of the absence. Failure to report an absence results in the absence being considered unexcused, and the early education or child care program is required to report any unexcused absence or seven consecutive excused absences to the department or community-based lead agency.⁴⁴

³⁵ Office of Child Care, *What We Do*, at <http://www.acf.hhs.gov/programs/occ/about/what-we-do> (last visited Nov. 13, 2015).

³⁶ In 2013, the Legislature established the Office of Early Learning in the Office of Independent Education and Parental Choice within the Department of Education (DOE). The office is administered by an executive director and is fully accountable to the Commissioner of Education but shall independently exercise all powers, duties, and functions prescribed by law, as well as adopt rules for the establishment and operation of the School Readiness program and the Voluntary Prekindergarten Education Program. Section 1, 2013-252, L.O.F., *codified as s. 1001.213*, F.S.

³⁷ Part VI, ch. 1002, F.S.; 42 U.S.C. ss. 618 & 9858-9858q.

³⁸ Specific Appropriation 88, s. 2, ch. 2014-51, L.O.F.

³⁹ Section 1002.88(1)(a), F.S.

⁴⁰ See ss. 402.301-319, F.S., and Part VI, ch. 1002, F.S.

⁴¹ Miami Herald, "Geraldyn Graham get 55 years in Rilya Wilson foster child abuse case," *available at* <http://www.miamiherald.com/latest-news/article1947207.html> (last accessed January 28, 2018).

⁴² S. 39.604, F.S.

⁴³ S. 39.604, F.S.

⁴⁴ S. 39.604(4), F.S.

Reports of two consecutive unexcused absences or seven consecutive excused absences result in a site visit to the child's residence. Children who are found missing during the site visit must be reported as missing to law enforcement and the procedures for locating missing children initiated. If the children are not found to be missing, the parent or caregiver is informed that repeated absences from the early education or child care program constitute a violation of the child's case plan. If more than two site visits must be made for a child, action is taken by DCF to notify the court of the parent or caregiver's non-compliance with the case plan.⁴⁵

Effect of Proposed Changes

Family Finding Program

The bill creates the framework for a "family finding" program that would serve as an additional resource for DCF and the CBCs to identify and engage potential relative and fictive kin caregivers in the child welfare system. Child protective investigators and the CBCs may initiate family finding protocols when a child is taken into custody following an investigation. This effort would involve identifying relatives and fictive kin who could be engaged in the dependency process and who could be potential caregivers. The bill defines "fictive kin" as an individual who is unrelated to the child by either birth or marriage, but has such a close emotional relationship with the child that he or she may be considered part of the family.

In making efforts to identify and locate relatives and fictive kin, DCF and the CBCs must use "diligent efforts" that include interviews with extended family and kin, genograms, eco-mapping, case mining, cold calls, and specialized computer searches. If and when relatives and fictive kin are identified, DCF and the CBCs may ask these parties to:

- Participate in a family group decision-making conference, family team conferencing, or other family meetings aimed at developing or supporting the family service plan;
- Attend visitations with the child;
- Assist in transportation of the child;
- Provide respite or child care services; or
- Provide actual kinship care.

Efforts to identify and engage relatives and fictive kin of a child who has been removed from his or her home must be documented in that child's case plan. The development of a statewide family finding program should help to streamline the dependency case process by allowing for the early identification of potential kinship caregivers and engaging them in the process.

The bill makes implementation of the family finding program discretionary for DCF, and subject to available resources.

Kinship Navigator Programs

The bill permits the CBCs to establish kinship navigator programs, subject to available resources. These informational tools would be designed to help relative caregivers and fictive kin navigate the range of support services available to them and children in their care. The navigators should, in theory, represent a full accounting of services available to caregivers and provided by public, private, community, and faith-based organizations.

In implementing kinship navigator programs, CBCs may coordinate with other state and local agencies and organizations to provide complete information on support services and to avoid the duplication or fragmentation of services to kinship care families. As part of the programs, CBCs are encouraged to launch a toll-free telephone hotline that would provide information to connect kinship caregiver, kinship support group organizers, and relevant service providers to:

⁴⁵ Id.

- Each other;
- Eligibility and enrollment information for federal, state, and local services and benefits;
- Appropriate training to assist kinship caregivers in providing care and getting benefits; and,
- Legal services related to child custody and kinship care.

Child Care Services

Rilya Wilson Act

At present, the Rilya Wilson Act dictates that a child in court-ordered supervision or out-of-home care who is enrolled in an early education or child care program must attend that program 5 days per week. The bill creates a new exemption to this requirement for children ages 0-3. These infants and toddlers would, at the discretion of the court, be allowed to remain at home with a stay-at-home caregiver or attend an early education or child care program fewer than 5 days per week if they reside with a caregiver who works less than full time.

Lastly, the bill establishes new requirements that will allow for the continuity of a child's participation in early education or child care programs upon removal from the family home. If a child is removed from the home, the child must be allowed to remain in the same early education or child care program that the child had attended prior to removal. In cases where continued participation in the same program is not in the best interest of the child, the designated caregiver must work with a case manager, guardian ad litem, and relevant education and child care staff to determine an alternative setting for the child. DCF and providers of early education and child care services must develop protocols for continuity in such situations.

The bill provides an effective date of July 1, 2018.

II. FISCAL ANALYSIS & ECONOMIC IMPACT STATEMENT

A. FISCAL IMPACT ON STATE GOVERNMENT:

1. Revenues:

None.

2. Expenditures:

The bill is not expected to have a fiscal impact on state government since the creation of the family-finding program and kinship navigator program are contingent upon the availability of resources.

B. FISCAL IMPACT ON LOCAL GOVERNMENTS:

1. Revenues:

None.

2. Expenditures:

The bill is not expected to have a fiscal impact on local governments since the creation of the family-finding program and kinship navigator program are contingent upon the availability of resources. County sheriffs' offices that provide child protective investigations could choose to contribute to the implementation of the programs. The six counties in which the county sheriffs'

offices provide those services are Broward, Hillsborough, Manatee, Pasco, Pinellas, and Seminole. These counties receive grants from DCF to fund services provided.

C. DIRECT ECONOMIC IMPACT ON PRIVATE SECTOR:

The bill is not expected to have a fiscal impact on CBCs since the development of the family-finding program and kinship navigator program are contingent upon the availability of resources.

D. FISCAL COMMENTS:

None.